

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

JANE DOE,

Plaintiff,

v.

KNOX COUNTY,

Defendant.

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No. 3:22-CV-63-KAC-DCP

MOTION FOR LEAVE TO FILE DOCUMENT UNDER SEAL

Knox County Board of Education (“KCBOE”) moves this Court for leave to file Attachment 1 and 2 of the Declaration of James Allen under seal for the following reasons:

1. The matter before the Court is an action involving minor student and issues related to the Americans with Disabilities Act and Section 504 of the Rehabilitation Act.
2. Plaintiff’s has moved for a Preliminary Injunction pending Appeal, in order to respond KCBOE will be filing Declarations from KCBOE staff including Mr. Allen.
3. Mr. Allen is the Principal of L&N STEM Academy, and his declaration includes two documents from Ms. Doe’s educational records. These documents are medical records Ms. Doe provided KCBOE and the “Care Plan,” utilized by her previous school. Ms. Doe’s parent provided KCBOE these records as part of her enrollment and to assist in the development of her 504 plan at KCBOE.
4. Defendant KCBOE believes that it has redacted any and all identifying information but considering Plaintiff’s minor status and the media attention this case has drawn, KCBOE files this Motion to File under seal out of an abundance of caution.

5. The granting of this Motion will not prejudice Plaintiff in anyway as Plaintiff is already in possession of these records. Counsel for KCBOE will also furnish Counsel for Plaintiff a copy of the proposed sealed attachments if necessary.

For the reasons stated above, KCS moves this Court for leave to file Attachment 1 and 2 of the Declaration of James Allen under seal.

Respectfully submitted,

s/Amanda Lynn Morse
Amanda Lynn Morse (BPR # 032274)
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically on the date recorded by the Court's electronic filing system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular United States Mail, postage prepaid. Parties may access this filing through the Court's electronic filing system.

s/Amanda Lynn Morse
Amanda Lynn Morse